

**IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

IN RE:
Kathleen Susan Glenn
Debtor

CASE NO. 8:15-bk-12505-CPM
Chapter 13

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**RESPONSE TO MOTION
FOR RELIEF FROM AUTOMATIC STAY AS TO DEBTOR**

COMES NOW, the Debtor, Kathleen Susan Glenn, by and through her undersigned attorney, (the “Debtor”), and responds to Regions Bank’s (“Regions”) *Motion for Relief From Automatic Stay*, (Doc. No. 16) as follows:

1. Regions is premature in this Motion because the Debtor’s Plan clearly states that she intends to move for a Mortgage Modification Mediation (“MMM”).
2. Regions correctly acknowledges this Debtor’s objective in Paragraph 13 of its Motion.
3. Regions even emphasizes that the adequate protection payment as stated in the Plan is actually more than the “regular monthly payment due” on the loan.
4. The purpose of Debtor’s intention to proceed with a MMM is to modify the loan in order to pay Regions its adequate protection and find a reasonable approach to resolve the arrears.

WHEREFORE, the Debtor, having fully responded to Regions *Motion for Relief From Automatic Stay* and asks this Court to deny the Motion.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the *Response To Motion For Relief From Automatic Stay was* furnished this 25th day of February, 2016 by regular U.S. Mail or electronically to:

Creditor's Attorney: Starlett M. Massey, Esq., McCumber, Daniels, Buntz, Hartig & Puig, PA,
4401 W. Kennedy Blvd., #200, Tampa, FL 33609 (smassey@mccumberdaniels.com)

Dated this February 25, 2016.

/s/ Steven M. Fishman
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